

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

Case No.: 2:97-cr-00098-6

RANDY M. YAGER,
Defendant.

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE REPLY TO THE
GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION FOR ORDER
REDUCING SENTENCE OR MODIFYING JUDGMENT**

Defendant Randy M. Yager, by and through his attorneys, Alexander E. Basinski, Esq., Lipsitz Green Scime Cambria, LLP, hereby moves this Court for an order extending the original seven day time period for filing of the Defendant’s Reply to the Government’s Response to Defendant’s Motion for Order Reducing Sentence or Modifying Judgment (“Motion”).

The government filed its response to Defendant’s Motion on September 22, 2020. (*See* Response, Dkt. No. 2229.) Pursuant to this Court’s September 1, 2020 Order, Defendant may reply within seven days of the government’s response. (*See* Order, Dkt. No. 2224.) As a result, Defendant’s reply brief is due to be filed no later than September 29, 2020.

Due to your deponent’s current caseload and preparation for upcoming trials and hearings, including pre-existing deadlines for reply briefs in other federal cases, we respectfully request a fourteen day extension of the deadline from September 29, 2020 to October 13, 2020.

Your deponent has conferred with counsel for the government, Carol L. Kraft, Esq., who does not oppose this request.

DATED: Buffalo, New York
September 25, 2020

Respectfully submitted,

/s/Alexander E. Basinski

ALEXANDER E. BASINSKI, ESQ.
LIPSITZ GREEN SCIME & CAMBRIA LLP
Attorney for Defendant
RANDY M. YAGER
Office and Post Office Address
42 Delaware Avenue – Suite 300
Buffalo, New York 14202
(716) 849-1333

TO: CAROL L. KRAFT, ESQ.
ASSISTANT UNITED STATES ATTORNEY
517 E Wisconsin Avenue – Room 530
Milwaukee, WI 53202